

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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KAREN MOMBER,

Plaintiff,

v.

ROBERT L. WILKIE, Secretary,  
U.S. Department of Veterans Affairs,

Defendant.

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Civil Action No. 19-2322 (RC)

**CONSENT MOTION TO EXTEND TIME TO ANSWER**

On behalf of Defendant Robert L. Wilkie, Secretary, U.S. Department of Veterans Affairs, the undersigned counsel respectfully requests a 31-day extension of time, until October 28, 2019, to answer or otherwise respond to Plaintiff's Petition for Writ of Mandamus, filed August 2, 2019. ECF No. 1. Plaintiff consents to the relief requested herein.

In support of this motion, Defendant states as follows:

1. This case involves Plaintiff's April 2019 request to Defendant under the Freedom of Information Act ("FOIA") seeking agency records related to her hearing before the Administrative Investigation Board. ECF No. 1.

2. On August 28, 2019, the United States Attorney was served with the Summons and Petition in this case. Without the relief requested, Defendant must respond to the Petition by September 27, 2019. 5 U.S.C. § 552(a)(4)(C).

3. On September 17, 2019, Defendant sent Plaintiff a response to her FOIA request. The undersigned counsel for Defendant and counsel for Plaintiff intend to confer regarding this response in an effort to resolve any further issues without additional litigation. The requested extension will facilitate the parties' efforts to attempt to resolve the case.

4. The extension requested by Defendant will not affect any other deadlines in this case. This is the first time that Defendant has requested an extension of the deadline to respond to the Petition.

5. Pursuant to Local Civil Rule 7(m), on September 18 and 19, 2019, the undersigned counsel conferred with counsel for Plaintiff to determine whether there is any opposition to the relief sought in this motion. Counsel for Plaintiff stated that he consents to the relief requested herein.

For the foregoing reasons, Defendant respectfully requests that the Court grant this motion and allow it to answer or otherwise respond to the Petition on or before October 28, 2019. A proposed Order has been filed with this motion.

Dated: September 23, 2019

Respectfully submitted,

JESSIE K. LIU, D.C. Bar # 472845  
United States Attorney

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Chief, Civil Division

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